IN THE Supreme Court of the United States

DEBRA A. VITAGLIANO,

PETITIONER,

V.

COUNTY OF WESTCHESTER,

RESPONDENT.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the brief of the Liberty Justice Center as *amici curiae* in support of Petitioner contains 2,260 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

August 24, 2023

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